

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

GETTY IMAGES, INC.; and GETTY
IMAGES (US), INC.,

Petitioners,

v.

CAR CULTURE, INC., a Florida corporation;
AUTOMOBILIA II, LLC, a Florida limited
liability company,

Respondents.

No.

**DECLARATION OF VAUGHN
BENCH IN SUPPORT OF PETITION
TO COMPEL ARBITRATION**

I, Vaughn Bench, declare as follows:

1. I am a Senior Royalty Operations Analyst at Getty Images (Seattle), Inc., a position I have held for six years. Getty Images (Seattle), Inc. provides support services to Getty Images, Inc. and Getty Images (US), Inc. (collectively,

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1 “Getty Images”). I make this Declaration based upon personal knowledge and, if
2 called to testify, could and would testify competently to the facts set forth herein.

3 2. In my capacity as an Operations Analyst, I regularly generate reports
4 on revenue and royalty data, and am familiar with the computerized system used
5 by Getty Images to record and store such data.

6 3. Attached as Exhibit A is a true and correct copy of a royalty statement
7 covering the years 2019 and 2020 for Car Culture, Inc.

8 4. The amount of each payment to Car Culture, Inc. and the customer
9 associated with each transaction have been redacted because that information is
10 treated as proprietary and confidential business information by Getty Images (US),
11 Inc.

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13 I declare under penalty of perjury that the foregoing is true and correct.

14 Executed: June 21, 2022.

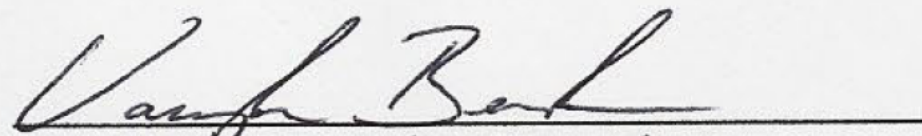
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EXHIBIT A

February 2019

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| 16447802- 86024826 | 26-Feb-19 | Licensed Image | Photos.co m USA COO / Portal | Car Cultur e | 158642814 | car02caa12 091086 | 158642814-1 965 Cadilla c DeVille C onvertible Coupe | Printing / Reprograph ics | Retail -- p oster | World Jan 01, 2019 t o Jan 31, 2019 | WASHINGTON 100.00% | Photos.com - POD | |
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March 2019

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| 16502209- 86917710 | 26-Mar-19 | Licensed Image | Photos.co m USA COO / Portal | Car Cultur e | 73740013 | rtmocl0770 307 | 73740013-19 50 Dodge Co ronet Sedan in Garden W ay Motel Mi ssou | Printing / Reprograph ics | Retail -- p oster | World Feb 01, 2019 t o Feb 28, 2019 | WASHINGTON 100.00% | Photos.com - POD | |
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June 2019

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| 16707352-91384404 | 22-Jun-19 | Licensed Image | Pixels.com COO / Portal | Car Culture | 71814946 | rtaccl001008 | 71814946-1966 Shelby GT 350 & 1966 Chevrolet Corvette Stingray | Politics / Religion | Retail -- poster | World Feb 08, 2019 to Feb 28, 2019 | CALIFORNIA | 100.00% | Partner Portal | |
| 16707307-91385461 | 22-Jun-19 | Licensed Image | Pixels.com COO / Portal | Car Culture | 72631204 | rtaccl0010079 | 72631204-Roy's Motel, Cafe, and Gas on Route 66, East of Barstow | Politics / Religion | Retail -- poster | World Mar 01, 2019 to Mar 31, 2019 | CALIFORNIA | 100.00% | Partner Portal | |
| 16707352-91384395 | 22-Jun-19 | Licensed Image | Pixels.com COO / Portal | Car Culture | 73739580 | chbec0101463 | 73739580-1955 Chevrolet Bel Air C convertible at Bob's Big Boy | Politics / Religion | Retail -- poster | World Feb 08, 2019 to Feb 28, 2019 | CALIFORNIA | 100.00% | Partner Portal | |
| 16707352-91384398 | 22-Jun-19 | Licensed Image | Pixels.com COO / Portal | Car Culture | 73739989 | rtaccl0010189 | 73739989-1960 Lincoln Continental Mark V Convertible at Trad | Politics / Religion | Retail -- poster | World Feb 08, 2019 to Feb 28, 2019 | CALIFORNIA | 100.00% | Partner Portal | |
| 16707352-91384406 | 22-Jun-19 | Licensed Image | Pixels.com COO / Portal | Car Culture | 73740085 | stcccl00020120 | 73740085-1953 Studebaker Starliner Coupe at LAX Airport in L | Politics / Religion | Retail -- poster | World Feb 08, 2019 to Feb 28, 2019 | CALIFORNIA | 100.00% | Partner Portal | |
| 16707345-91386205 | 22-Jun-19 | Licensed Image | Pixels.com COO / Portal | Car Culture | 90441668 | pmoccl00051376 | 90441668-1971 Porsche 908/03 | Politics / Religion | Retail -- poster | World Apr 01, 2019 to Apr 30, 2019 | CALIFORNIA | 100.00% | Partner Portal | |

July 2019

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| 16771354-92389995 | 23-Jul-19 | Licensed Image | Pixels.com COO / Portal | Car Culture | 72630907 | foscccl00092113 | 72630907-1964 Ford Thunderbird Convertible | Politics / Religion | Retail -- poster | World Jun 01, 2019 to Jun 30, 2019 | CALIFORNIA | 100.00% | Partner Portal | |
| 16771368-92390669 | 23-Jul-19 | Licensed Image | Pixels.com COO / Portal | Car Culture | 73739580 | chbec0101463 | 73739580-1955 Chevrolet Bel Air C convertible at Bob's Big Boy | Politics / Religion | Retail -- poster | World Jun 01, 2019 to Jun 30, 2019 | CALIFORNIA | 100.00% | Partner Portal | |
| 16771341-92389832 | 23-Jul-19 | Licensed Image | Pixels.com COO / Portal | Car Culture | 73739580 | chbec0101463 | 73739580-1955 Chevrolet Bel Air C convertible at Bob's Big Boy | Politics / Religion | Retail -- poster | World May 01, 2019 to May 31, 2019 | CALIFORNIA | 100.00% | Partner Portal | |
| 16771372-92390713 | 23-Jul-19 | Licensed Image | Pixels.com COO / Portal | Car Culture | 72070777 | cascccl00011056 | 72070777-1958 Cadillac Series 62 Coupe | Politics / Religion | Retail -- poster | World Jun 01, 2019 to Jun 30, 2019 | CALIFORNIA | 100.00% | Partner Portal | |
| 16771372-92390712 | 23-Jul-19 | Licensed Image | Pixels.com COO / Portal | Car Culture | 72071133 | pgoccl00010343 | 72071133-1964 Pontiac GTO Convertible | Politics / Religion | Retail -- poster | World Jun 01, 2019 to Jun 30, 2019 | CALIFORNIA | 100.00% | Partner Portal | |

August 2019

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| 16844644-94580204 | 27-Aug-19 | Licensed Image | Pixels.com COO / Portal | Car Culture | 84288232 | 84288232-19009 | 84288232-1983 DeLorean Coupe | Politics / Religion | Retail -- poster | World Jul 01, 2019 to Jul 31, 2019 | CALIFORNIA | 100.00% | Partner Portal | |
| 16844660-94580189 | 27-Aug-19 | Licensed Image | Pixels.com COO / Portal | Car Culture | 71814959 | 71814959-399 | 71814959-66 Park-in Theater | Politics / Religion | Retail -- poster | World Jul 01, 2019 to Jul 31, 2019 | CALIFORNIA | 100.00% | Partner Portal | |
| 16844660-94580188 | 27-Aug-19 | Licensed Image | Pixels.com COO / Portal | Car Culture | 73739927 | 73739927-064 | 73739927-Rossies Diner | Politics / Religion | Retail -- poster | World Jul 01, 2019 to Jul 31, 2019 | CALIFORNIA | 100.00% | Partner Portal | |

September 2019

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| 16910232-96019946 | 26-Sep-19 | Licensed Image | Pixels.com COO / Portal | Car Culture | 73739797 | 73739797-130 | 73739797-1929 Mercedes Benz SSKL | Politics / Religion | Retail -- poster | World Aug 01, 2019 to Aug 31, 2019 | CALIFORNIA | 100.00% | Partner Portal | |
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November 2019

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| 16912677-97381090 | 08-Nov-19 | Licensed Image | Pixels.com COO / Portal | Car Culture | 73740032 | 73740032-218 | 73740032-1959 Buick Electra 225 at the Continental Division | Politics / Religion | Retail -- poster | World Oct 01, 2019 to Oct 31, 2019 | CALIFORNIA | 100.00% | Partner Portal | |
| 16952391-97102964 | 10-Nov-19 | Licensed Image | Pixels.com COO / Portal | Car Culture | 72071125 | 72071125-667 | 72071125-1959 Oldsmobile Super 88 Holiday Sedan Coupe | Politics / Religion | Retail -- poster | World Sep 01, 2019 to Sep 30, 2019 | CALIFORNIA | 100.00% | Partner Portal | |
| 16952391-97102963 | 10-Nov-19 | Licensed Image | Pixels.com COO / Portal | Car Culture | 72071142 | 72071142-078 | 72071142-C1 Classic 1950s and 1960s cars in front of the Cozy D | Politics / Religion | Retail -- poster | World Sep 01, 2019 to Sep 30, 2019 | CALIFORNIA | 100.00% | Partner Portal | |

January 2020

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| 17129226-99577816 | 09-Jan-20 | Licensed Image | Pixels.com COO / Portal | Car Culture | 72070933 | 72070933-583 | 72070933-1933 Duesenberg Model SJ Speedster with special coach | Politics / Religion | Retail -- poster | World Dec 01, 2019 to Dec 31, 2019 | CALIFORNIA | 100.00% | Partner Portal | |
| 17129236-99577792 | 09-Jan-20 | Licensed Image | Pixels.com COO / Portal | Car Culture | 90441938 | 90441938-061 | 90441938-1939 Porsche 60K10 | Politics / Religion | Retail -- poster | World Dec 01, 2019 to Dec 31, 2019 | CALIFORNIA | 100.00% | Partner Portal | |
| 17129239-99577734 | 09-Jan-20 | Licensed Image | Pixels.com COO / Portal | Car Culture | 82352675 | 82352675-610545 | 82352675-1960 Chevrolet Corvette | Politics / Religion | Retail -- poster | World Dec 01, 2019 to Dec 31, 2019 | CALIFORNIA | 100.00% | Partner Portal | |
| 17129242-99577740 | 09-Jan-20 | Licensed Image | Pixels.com COO / Portal | Car Culture | 71814592 | 71814592-487 | 71814592-Gauges | Politics / Religion | Retail -- poster | World Dec 01, 2019 to Dec 31, 2019 | CALIFORNIA | 100.00% | Partner Portal | |

February 2020

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| 17206708-100912818 | 11-Feb-20 | X Culled Lic | Pixels.com COO / Portal Car Culture | 90441697 | prgcl0053447 | 90441697-1963 Porsche 356B/2000 GS Carrera 2 | Politics / Religion | CALIFORNIA | 100.00% | Partner Portal | |
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April 2020

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| 17354498-102849184 | 09-Apr-20 | X Culled Lic | Pixels.com COO / Portal Car Culture | 73740065 | rtxcl0410255 | 73740065-The 1960 Cadillac Series 62 Convertible parked alone | Politics / Religion | CALIFORNIA | 100.00% | Partner Portal | |
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